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THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

2015 MAR 12 P 4: 24

SUSAN BITTER SMITH, Chairman
BOB STUMP
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DOUG LITTLE
TOM FORESE

AZ CORP COMMISSION
DOCKET CONTROL

In the matter of:

DOCKET NO. S-20906A-14-0063

CONCORDIA FINANCING COMPANY,
LTD, a/k/a "CONCORDIA FINANCE,"

**RESPONDENT CONCORDIA
FINANCE'S LIST OF WITNESSES AND
EXHIBITS**

ER FINANCIAL & ADVISORY SERVICES,
L.L.C.,

LANCE MICHAEL BERSCH, and

DAVID JOHN WANZEK and LINDA
WANZEK, husband and wife,

Respondents.

ORIGINAL

Respondent Concordia Financing Company, Ltd., a/k/a Concordia Finance ("Concordia"),
through undersigned counsel, submits its List of Witnesses and Exhibits.

WITNESSES

1. Kenneth Crowder;
2. Christopher Crowder;
3. Armen Dekmejian;
4. Gary Clapper;
5. Lance Michael Bersch;
6. David John Wanzek;
7. All witnesses listed by the Securities Division;

Arizona Corporation Commission

DOCKETED

MAR 12 2015

DOCKETED BY

1 8. All witnesses listed by Respondents ER Financial & Advisory Services, Lance
2 Michael Bersch, David John Wanzek and Linda Wanzek (collectively "ER Respondents"); and

3 9. Rebuttal or cross-examination witnesses.

4 Concordia reserves the right to supplement this witness list based upon receipt of discovery
5 from the Division and/or the ER Respondents.

6 **EXHIBITS**

7
8 1. February 4, 2000 Action by Written Consent of the Shareholders of Concordia
9 Finance Co., Ltd. and Minutes of the Board of Directors of Concordia Financing Co., Ltd.;

10 2. Contracts and Servicing Agreements related to Theresa & Steven Patricola;

11 3. March 6, 2009 letter from Chris Crowder to Jill McClaren;

12 4. Investor Transaction Report;

13 5. Concordia Financing Company, Ltd. Financial Statements December 31, 2010 and
14 2009; and

15 6. Preliminary and Unaudited Statements of Financial Earnings for years 2008, 2011,
16 2012 and 2013.

17
18 Concordia will utilize as documentary evidence in this proceeding documents that have
19 been previously produced to the Division and the Department of Corporations of the State of
20 California at any time. Concordia will also utilize those documents produced by the Division and
21 the ER Respondents. Concordia reserves the right to use such additional documents upon
22 immediate notification and production to the Division, if such documents are found or created by
23 Concordia before the hearing. In addition, Concordia will use documents received from subpoenas
24 and third-parties which have been produced to the Division or are enclosed herewith. Concordia
25
26
27

BASKIN RICHARDS PLC
2901 NORTH CENTRAL AVENUE
SUITE 1150
PHOENIX, ARIZONA 85012
TELEPHONE NO 602-812-7979
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1 reserves the right to use such additional documents as are furnished pursuant to any other third-
2 party subpoena or such other sources that may subsequently be received.

3 Concordia reserves the right to use documents not identified above in cross-examination or
4 rebuttal. Concordia also reserves the right to supplement this document exchange based upon
5 receipt of documents or information from the Division or third-parties as well as documents which
6 any of the parties have agreed to produce or have been ordered to produce, but have not yet done
7 so.

8 RESPECTFULLY SUBMITTED this 12 day of March, 2015.

9 BASKIN RICHARDS PLC

10
11
12 By David E. Wood

13 Alan S. Baskin
14 David E. Wood
15 2901 North Central Avenue, Suite 1150
16 Phoenix, Arizona 85012
17 Attorneys for Respondent
18 Concordia Finance

19 ORIGINAL and thirteen copies of the foregoing
20 filed this 12 day of March, 2015 with:

21 Docket Control
22 Arizona Corporation Commission
23 1200 West Washington Street
24 Phoenix, AZ 85007

25 COPY of the foregoing hand-delivered
26 this 12 day of March, 2015 to:

27 Hearing Officer
Hearing Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

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1 COPY of the foregoing e-mailed/mailed
2 this 12th day of March, 2015 to:

3 James Burgess
4 Securities Division
5 Arizona Corporation Commission
6 1300 W. Washington, 3rd Floor
7 Phoenix, AZ 85007

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